

Tucson Iron & Metal

Custom Incineration

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February 22, 2021

Roshni Brahmhatt
Manager Air Enforcement Office
Enforcement and Compliance Assurance Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Tucson Iron and Metal (TIM)
PDEQ Air Permit No. 127 / NSPS EEEE
TIM §114 Information
Tucson, Pima County, Arizona

Dear Ms. Brahmhatt:

Tucson Iron & Metal (TIM) is providing response to the U.S. EPA Region 9 request for information to be used to determine TIM's contraband incineration unit compliance status with regard to requirements of the New Source Performance Standard (NSPS) for Other Solid Waste Incineration (OSWI) Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 (40 CFR Part 60, Subpart EEEE). TIM understands that the EPA Administrator is requesting information under section 114(a) of the federal Clean Air Act (CAA) and has delegated authority to request such information to the manager for EPA's Region 9 Air Enforcement Office, Enforcement and Compliance Assurance Division.

NSPS Subpart EEEE, section 60.2951, requires reports as listed in Table 4 to Subpart EEEE of Part 60 - Summary of Reporting Requirements. The reporting requirements include (1) a preconstruction report, (2) startup notification, (3) an initial test report, (4) an annual report, (5) an emission limitation or operating limit deviation report, (6) a qualified operator deviation notification, (7) a qualified operator deviation status report and (8) a qualified operator deviation notification of resumed operation. All reporting requirements were met when applicable. There were no qualified operator deviations.

In accordance with TIM's request for extension dated December 16, 2020, TIM is providing the responses to EPA's request for information for Appendix C, Items 1, 2, 6, 7a, 7c, and 8 within the 45-calendar day extension deadline of Thursday, February 25, 2021 granted by the EPA. Responses are provided below.

1. Provide the date for commencement of construction of the contraband incineration kiln and supporting documents such as construction contracts, installation permits, and/or operating permits.

TIM Response: There was a contraband incinerator on the site when TIM purchased it from the previous owners in the year 2000. TIM is uncertain of the date of original construction of the incinerator but knows it to be sometime before 1986. TIM has no supporting documents related to the original construction of the contraband incinerator.

2. If the contraband incineration kiln has been modified, provide the date(s) of the modification(s) and all supporting documents.

TIM Response: Modifications to the contraband incinerator were made in March 2006. Additional modifications to the contraband incinerator were performed beginning in August of 2015 and ending in August of 2016. Finally, the CEMS unit was replaced in December of 2019.

The Minor Permit Revision related to the March 2006 modification was submitted with the January 5, 2021 response as Appendices 3-1 and 3-2. Operating Permit 127, dated April 22, 2010, is provided as Appendix 2-1. Operating Permit 127, dated March 26, 2018, is provided as Appendix 2-2. The EPA Approval of revised Operating Parameter Limits (OPLs) dated September 27, 2016 is provided as Appendix 2-3.

No installation permits were required for any of the modifications as Pima County does not require building permits for manufacturing, processing or fabricating normally considered industrial use. For the March 2006 modification, TIM does not have construction contracts, but is providing the invoices for the modification work performed as Appendices 2-4 and 2-5. For the 2015-2016 modifications, TIM is providing construction contracts where available, and invoices for work performed where no contracts exist, as Appendices 2-6 through 2-38. For the December 2019 replacement of the CEMS, no operating permit modification was required, pursuant to PDEQ Permit 127 condition 16.b. TIM is providing the quote for this modification as Appendix 2-39.

Supporting documents are provided as follows:

- Appendix 2-1 – PDEQ Permit 127 2010
- Appendix 2-2 – PDEQ Permit 127 2018
- Appendix 2-3 – EPA Approval of OPLs 2016
- Appendix 2-4 – Phillips Kiln Services Invoice 1056
- Appendix 2-5 – Phillips Kiln Services Invoice 29054
- Appendix 2-6 – Apperson Plumbing Invoice 112389
- Appendix 2-7 – Apperson Plumbing Invoice 113054
- Appendix 2-8 – Bearing Belt & Chain Invoice 1400599
- Appendix 2-9 – Bruce Baker Invoice AMCEP 25-1
- Appendix 2-10 – Bruce Baker Invoice AMCEP 26-1

Appendix 2-11 – Bruce Baker Invoice AMCEP 27-1
Appendix 2-12 – Bruce Baker Invoice AMCEP 28-1
Appendix 2-13 – Bruce Baker Invoice AMCEP 29-1
Appendix 2-14 – Bruce Baker Invoice AMCEP 30-1
Appendix 2-15 – Bruce Baker Invoice AMCEP 31-1
Appendix 2-16 – Bruce Baker Invoice AMCEP 32-1
Appendix 2-17 – Bruce Baker Invoice AMCEP 33-1
Appendix 2-18 – Bruce Baker Invoice AMCEP 34-1
Appendix 2-19 – Bruce Baker Invoice AMCEP 35-1
Appendix 2-20 – Contec Systems Proposal P2015-06-53REV#1
Appendix 2-21 – EEMC Invoice 10885
Appendix 2-22 – Energy Services Group Invoice 11162
Appendix 2-23 – Harold Beck & Sons Invoice 303458
Appendix 2-24 – J.T. Thorpe & Son Invoice 51142
Appendix 2-25 – J.T. Thorpe & Son Invoice 51151
Appendix 2-26 – Linson Portable Welding Invoice 5056
Appendix 2-27 – Linson Portable Welding Invoice 5077
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Appendix 2-34 – Linson Portable Welding Invoice 5112
Appendix 2-35 – Linson Portable Welding Invoice 5181
Appendix 2-36 – Sun Mechanical Invoice 785711115
Appendix 2-37 – Sunstate Power & Solar Solutions Invoice 1410
Appendix 2-37 – Sunstate Power & Solar Solutions Invoice 1513
Appendix 2-38 – Tucson Fluid Power Technologies Invoice 158354
Appendix 2-39 – EPA Systems Quote 2019-Tucson-101

6. From April 2019 to the present, for each instance when the CEMS have been determined to be “Out of Control” following a RATA test (see 40 C.F.R. Part 60, Appendix F, Procedure 1, Section 5.2), provide the following information:
 - a. Each date and time TIM determined the CEMS to be Out of Control (see 40 C.F.R. Part 60, Appendix F, Procedure 1, Section 5.2).

TIM Response: Having failed the RATA performed on April 23, 2019, the Environment SA multi-gas analyzer CEMS was Out of Control from April 23, 2019 through December 4, 2019 (8 burn dates totaling 45.67 hours).

TIM installed a new Teledyne-API Model T-300 CEMS unit on December 4, 2019 and performed a Cylinder Gas Audit (CGA) on the new equipment on that date. TIM believed the CGA was sufficient to establish Relative Accuracy for the new CEMS unit, since the new unit was never determined to be Out of Control. Pima County Department of Environmental Quality (PDEQ) informed TIM during a meeting on June 24, 2020 that this CGA was insufficient and that a RATA should have been conducted upon installation of the new CEMS. Therefore, per PDEQ's written instructions, issued in a memorandum dated July 22, 2020, TIM reported emissions as Out of Control from the December 4, 2019 installation date of the Teledyne-API Model T-300 until a RATA was performed on the new CEMS unit on July 21, 2020 (19 burn dates totaling 106.74 hours).

Having failed the RATA on July 21, 2020, TIM confirmed the Teledyne-API Model T-300 CEMS unit was Out of Control from July 21, 2020 through September 10, 2020, when it passed a RATA (5 burn dates totaling 18.34 hours).

- b. State the corrective actions taken to address each Out of Control condition and provide the supporting documentation.

TIM Response: After the CEMS RATA failure in April 2019, TIM attempted to repair and calibrate the CEMS in order to prepare for a second RATA. TIM's outside engineer, Bruce Baker, contacted Bison Engineering in May 2019 for the data necessary to help him correct a ratio fault, and perform other repairs to the CEMS. TIM was preparing the CEMS for a second RATA when the CEMS unit was vandalized on June 20, 2019. Please find Pima County Sheriff Incident report #190620006 attached as Appendix 6b-1. Once the unit was vandalized and the decision was made to replace the CEMS, TIM did not schedule a second RATA, since the unit was going to be replaced.

When TIM installed the Teledyne-API Model T-300 CEMS in December of 2019, a CGA was conducted to certify the new unit. The CGA is provided as Appendix 6b-2.

After the June 24, 2020 meeting with PDEQ, TIM scheduled a RATA as soon as possible. This RATA was conducted on July 21, 2020, and the results were previously submitted to EPA with the January 5, 2021 response as Appendix 4-4.

After the July 21, 2020 RATA, TIM contracted with Baker Enterprises to reprogram the PLC and HMI and tighten the O₂ calibration in order to pass a subsequent RATA. This work was performed in August of 2020 and documentation is attached as Appendix 6b-3. TIM scheduled another RATA to coincide with the annual performance testing, which took place on September 9-10, 2020. The results of this RATA were previously submitted to EPA with the January 5, 2021 response as Appendix 4-5.

- c. For each RATA resulting in excessive audit inaccuracy (see 40 C.F.R. Part 60, Appendix F, Procedure 1, Section 5.2.3) and showing the CEMS to be Out of Control, provide all the reports required by 40 C.F.R. Part 60, Appendix F, Procedure 1, Section 5.2. that TIM submitted to Pima County DEQ and/or EPA.

TIM Response: The April 23, 2019 RATA and the July 21, 2020 RATA resulted in excessive audit inaccuracy. The September 10, 2020 RATA corrected the out-of-control period and showed the CEMS to be operating within specifications. The RATA reports required by this section were submitted with the January 5, 2021 response as Appendices 4-3, 4-4, and 4-5, respectively

- d. For each subsequent audit that TIM performed following corrective action(s) provide the audit results.

TIM Response: In addition to the RATA results included in Appendices 4-3, 4-4 and 4-5 submitted with the January 5, 2021 response, TIM is including CGA results as follows:

Appendix 6b-2 – 2019.12.04 CGA
Appendix 6d-1 – 2020.03.25 CGA
Appendix 6d-2 – 2020.06.20 CGA

- e. Written Quality Control (“QC”) procedures as required by 40 C.F.R. Part 60, Appendix F, Procedure 1, Section 3.

TIM Response: TIM had Quality Control procedures incorporated into various sections of its Operating and Maintenance Plan (O&M Plan) at the time of the April 23, 2019 failure. The O&M plan is provided in Appendix 2-2, PDF document pages 57-98. QC procedures are addressed in sections IV.B.(1)(c) (PDF pg 61); IV.E.(2)(b) (PDF pg 63); IV.F.Possible Malfunction and Corrective Action Procedures(3) (PDF pg 65); and V.E. (PDF pg 69).

In July 2020, TIM developed more consolidated and complete Quality Control procedures, which are provided as Appendix 6e.

- f. For each Out of Control condition occurring in any two successive quarters (see 40 C.F.R. Part 60, Appendix F, Procedure 1, Section 5.3), provide the revised QC procedures or state the date(s) the CEMS were modified and/or replaced.

TIM Response: TIM replaced its CEMS on December 4, 2019. TIM revised its written QC procedures in July 2020. These are provided as Appendix 6e.

- 7. On December 11, 2019, Pima County DEQ Inspector Rogers conducted an inspection at the TIM facility. Inspector Rogers noted the following items observed during the inspection in his inspection report:

- a. The sorbent injection system was not in operation during incineration activity at the time of the inspection, as required by Section 3, Condition 52.b and Attachment 4, condition V.B of Pima County DEQ Class I Permit issued on March 26, 2018. Although advised to take corrective action, TIM personnel initiated no action to correct the lack of sorbent supply.
 - i) For the December 11, 2019 incineration activity, state the corrective action(s) taken by TIM personnel concerning the sorbent injection system, state the date and time sorbent was initially introduced to the incineration air pollution control equipment, and provide all supporting documentation
 - ii) If no corrective action was taken, explain why and provide the date and time the sorbent was initially introduced to the incineration air pollution control equipment, and provide all supporting documentation.

TIM Response: The sorbent injection system was operating properly at the beginning of the contraband burn on December 11, 2019, but the sorbent supply in the system was exhausted at about the same time that the Process Upset occurred – around 11:00am. The Process Upset resulted in the qualified operator, Mr. Peter Torres, being distracted from his routine Standard Operating Procedure, which included keeping the sorbent supply in the injection system properly filled. The OSWI unit operator became redirected near the beginning of the December 11, 2019 burn into the effort to bring the operating parameters of the unit back into compliance. The qualified operator was unaware that the sorbent had been exhausted until much later in the day, when PDEQ Inspector M. Rogers pointed it out.

No corrective action was taken on December 11, 2019, because Mr. Torres, the OSWI operator, was occupied with resolving the Process Upset condition and finishing the burn. There were insufficient personnel on site to assist with transporting the 2000-pound bag of sorbent to the furnace and hanging it in the injection system. As a result of the December 11, 2019 incident, TIM has provided a helper staff member for every subsequent contraband burn. The function of the helper is to keep sorbent supplied to the sorbent injection system. The helper monitors the sorbent injection system and stays in communication with the qualified operator during each burn.

Sorbent was reintroduced to the sorbent injection system on December 12, 2019. TIM's Mechanic, Gerald Amlee, changed the bag, refilled the hopper, and performed a test run of the sorbent injection system. Mr. Amlee's dayminder page from December 12, 2019 is provided as Appendix 7a-1. The sorbent injection system was running properly for the next contraband burn on December 17, 2019, as evidenced by the Sorbent Injection log completed by the qualified operator on that date and provided as Appendix 7a-2.

- c. During the inspection, TIM facility personnel pointed out to Inspector Rogers several locations where the equipment experienced “previous storm damage.” For each location of storm damage, provide the following information:

- i) State the specific nature of any storm damage

TIM Response: Insulating blanket had become waterlogged and heavy and fallen off the furnace due to thunderstorms that had occurred overnight on December 9, 2019.

- ii) State the location of any storm damage and provide equipment diagrams and photographs (if available) showing the location of any of the storm damage

TIM Response: The insulating blanket that had fallen off the furnace was where the rotary kiln joins the ash drop-out box. The photograph taken by Inspector Rogers is provided as Appendix 7c-1. The damage occurred in the area marked in red on the top-view floor plan provided as Appendix 7c-2.

- iii) State the date(s) that TIM first observed any of the storm damage

TIM Response: TIM first observed the storm damage on December 11, 2019.

- iv) State the date(s) that TIM 1) initiated and 2) completed each of the repairs of any storm damage

TIM Response: TIM initiated repairs to the storm damage on December 12, 2019 and completed repairs on December 13, 2019.

- v) Provide all documentation related to the repairs of any of the storm damage including, but not limited to, purchase orders or maintenance orders

TIM Response: TIM is attaching the dayminder pages for its mechanic, Gerald Amlee, as Appendix 7c-3, showing that blanket failure repairs started on December 12, and were completed on December 13. TIM is also attaching the receipt from J.T. Thorpe for insulating blanket purchased on May 28, 2019 as Appendix 7c-4. TIM purchases about 500 square feet of blanket each year to have on hand for any repairs needed throughout the year. Approximately 100 square feet was used on December 12-13, 2019 to repair the storm damage.

- vi) If any storm damage has not been repaired, provide the rationale why repair of the storm damage was not required for proper operation of the incinerator (e.g., cosmetic only).

TIM Response: All storm damage has been repaired.

8. Pima County DEQ issued TIM a Notice of Violation ("NOV") dated July 22, 2020

- a. Provide the comprehensive maintenance schedule of the Other Solid Waste Incinerator ("OSWI") during the operation of equipment and during downtime.

TIM Response: The OSWI unit is maintained on an as-needed basis, subject to results of inspections. The comprehensive schedule of inspections and maintenance is provided as Section IV.E. of the TIM OSWI Operation and Maintenance Plan, and is reproduced below:

The OSWI is to be maintained and records kept of the following:

- 1) Weekly inspections (coinciding w/scheduled burns), maintenance and records kept of the following:
 - a) Inspect all combustion chambers for refractory damage and repair as needed;
 - b) Check natural gas fuel lines and connections for leaks and check afterburner nozzles for blockage and repair as needed;
 - c) Check and clean blower fans as necessary;
 - d) Inspect and repair any structural area of the incinerator;
 - e) Check baghouse system pressure drop gauge settings are correct;
 - f) Check baghouse system air compressor system for proper operation;
 - g) Check and record baghouse system pressure drop reading at least once each day of operation;
 - 2) Quarterly inspections and procedures:
 - a) Inspect incinerator exhaust and perform quarterly Reference Method 9 opacity readings and record;
 - b) Check CEMS operations and perform quarterly cylinder gas calibration according to 40 CFR Part 60, Appendix F, requirements and record as necessary.
 - c) Calibration of sorbent injection (feeder) system as provided in Section V.B of this plan.
 - 3) Annual inspection and perform maintenance and recordkeeping as necessary:
 - a) Calibrate temperature monitoring instrumentation;
 - b) Calibrate weigh-in scale;
 - c) Inspect all burners, igniters and temperature sensing devices;
 - d) Inspect for proper adjustment of combustion air and dilution air;
 - e) Inspect fresh air vents, dampers, fans, blowers and motors for proper operation;
 - f) Inspect for proper sealing;
 - g) Inspect motors for proper operation;
 - h) Inspect combustion chamber refractory lining;
 - i) Inspect combustion chamber shells for corrosion and/or hot spots;
 - j) Inspect baghouse system for leaks and check fabric filter media for integrity;
 - k) Inspect baghouse blower and motor for proper operation;
 - l) Check pressure drop gauge settings are correct;
 - m) Inspect air compressor systems for proper operation;
 - n) Inspect and Calibrate Sorbent injection (feed) system.
- b. Provide the maintenance and inspection records as specified in the procedures listed in page 6, Section E of the January 2018 OSWI Operation and Maintenance Plan (see alleged violation 2 requested corrective action in the July 22, 2020 NOV).

TIM Response: The OSWI unit is maintained on an as-needed basis, subject to results of inspection. Inspections are performed on a weekly basis (coinciding with scheduled burns), quarterly basis, and annual basis, in accordance with page 6, Section E of the January 2018 O&M Plan. Before the NOV dated July 22, 2020, TIM had previously provided the weekly maintenance inspection records to PDEQ via the burn paperwork packets provided to PDEQ in response to Production of Records Requests dated January 8, 2020; May 7, 2020; May 22, 2020; and June 12, 2020. These burn paperwork packets are provided here as follows:

- Appendix 8b-1 – 19.08.07 Burn Packet
- Appendix 8b-2 – 19.12.03 Burn Packet
- Appendix 8b-3 – 19.12.06 Burn Packet
- Appendix 8b-4 – 19.12.11 Burn Packet (also previously provided as App. 7b)
- Appendix 8b-5 – 19.12.17 Burn Packet
- Appendix 8b-6 – 20.01.22 Burn Packet
- Appendix 8b-7 – 20.02.27 Burn Packet
- Appendix 8b-8 – 20.04.21 Burn Packet
- Appendix 8b-9 – 20.04.22 Burn Packet
- Appendix 8b-10 – 20.05.07 Burn Packet
- Appendix 8b-11 – 20.05.12 Burn Packet
- Appendix 8b-12 – 20.06.03 Burn Packet
- Appendix 8b-13 – 20.06.04 Burn Packet

In addition to the records listed above, which PDEQ already had at the time of the issuance of the NOV, TIM also provided the Daily Operators Log for Incinerator for any other burns for the first six months of 2020 to PDEQ in response to the NOV. These logs are provided here as Appendix 8b-14. Daily Operators Log for Incinerator for burns for the second six months of 2020 are provided as Appendix 8b-15.

TIM has provided CGAs dated December 4, 2019, March 25, 2020, and June 20, 2020 as Appendices 6b-2, 6d-1, and 6d-2, respectively. TIM is also including the CGA dated December 23, 2020 as Appendix 8b-16.

Method 9 Observations from December 2019, July 2020, September 2020, and November 2020 are provided as Appendices 8b-17, 8b-18, 8b-19, and 8b-20, respectively. TIM was unable to perform a Method 9 Observation in Q2 2020 due to the impact of COVID-19. TIM did not conduct burns in March, and the certification of our Method 9 contractor expired in April. TIM performed the Method 9 Observation on July 7, 2020 as the soonest available date after the contractor was re-certified on June 30, 2020.

The Sorbent Quarterly Calibrations dated March 25, 2020, June 3, 2020, August 13, 2020, and December 9, 2020 are provided as Appendix 8b-21.

The Annual Inspection Reports dated September 17, 2019 and August 13, 2020 are provided as Appendix 8b-22.

c. Provide the most recent OSWI Operation and Maintenance Plan.

TIM Response: The current OSWI Operation and Maintenance Plan is provided in Appendix 2-2, PDF document pages 57-98. TIM and PDEQ are in the process of finalizing a revised Operation and Maintenance Plan pursuant to the July 22, 2020 NOV. The most recent draft is provided as Appendix 8c.

I certify that I am fully authorized by Tucson Iron & Metal to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

If you have any questions or require additional information, please contact me at 520-884-1554.

Sincerely,



Gary Kippur, Vice President
February 22, 2021

cc: Mr. Rupesh Patel, Air Permits Manager
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Tucson, Arizona 85701-1429

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Enclosures:

Appendix 2-1 – PDEQ Permit 127 2010
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Appendix 2-39 – EPA Systems Quote 2019-Tucson-101
Appendix 6b-1 – Pima County Sheriff 190620006
Appendix 6b-2 – 2019.12.04 CGA
Appendix 6b-3 – Baker Enterprises Invoice AM 08-20
Appendix 6d-1 – 2020.03.25 CGA
Appendix 6d-2 – 2020.06.20 CGA
Appendix 6e – TIM QC Procedures
Appendix 7a-1 – 2019.12.12 DayMinder Page
Appendix 7a-2 – 2019.12.17 Sorbent Injection Log
Appendix 7c-1 – Photograph
Appendix 7c-2 – Top View Floor Plan
Appendix 7c-3 – 2019.12.12-13 DayMinder Pages
Appendix 7c-4 – J.T. Thorpe Invoice 0402-19-1428

Appendix 8b-1 – 19.08.07 Burn Packet
Appendix 8b-2 – 19.12.03 Burn Packet
Appendix 8b-3 – 19.12.06 Burn Packet
Appendix 8b-4 – 19.12.11 Burn Packet
Appendix 8b-5 – 19.12.17 Burn Packet
Appendix 8b-6 – 20.01.22 Burn Packet
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Appendix 8b-9 – 20.04.22 Burn Packet
Appendix 8b-10 – 20.05.07 Burn Packet
Appendix 8b-11 – 20.05.12 Burn Packet
Appendix 8b-12 – 20.06.03 Burn Packet
Appendix 8b-13 – 20.06.04 Burn Packet
Appendix 8b-14 – 2020 S1 Daily Operators Logs
Appendix 8b-15 – 2020 S2 Daily Operators Logs
Appendix 8b-16 – 2020.12.23 CGA
Appendix 8b-17 – 2019.12 Method 9
Appendix 8b-18 – 2020.07 Method 9
Appendix 8b-19 – 2020.09 Method 9
Appendix 8b-20 – 2020.11 Method 9
Appendix 8b-21 – Sorbent Calibrations
Appendix 8b-22 – Annual Inspections
Appendix 8c – Proposed O&M Plan

APPENDIX

ATTACHMENTS